

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

WILLIAM REYNOLDS, individually;
as Spouse of Sywia Pawlak Reynolds;
and as Next Friend of their minor
children, AMR, WR, and AR,

Plaintiff,

vs.

Nancy Sanders Harper, MD; Hennepin
County; Fairview Health Services; The
Board of Regents of the University Of
Minnesota; Hennepin Healthcare
System, Inc., d/b/a Hennepin County
Medical Center; Otto Bremer Trust;
The University Of Minnesota
Physicians d/b/a U of M Physicians;
The University of Minnesota
Foundation d/b/a U of M Foundation;
Britta Nicholson; Sarah Elizabeth
Lucken, MD; Seth Cheng Silbert, MD;
Mohamed Tahsin A. Jouhari, MD,

Defendants.

Case No. 25-CV-754-LMP-JFD

**STIPULATION TO EXTEND
FAIRVIEW HEALTH
SERVICES'S TIME TO
RESPOND TO PLAINTIFF'S
AMENDED COMPLAINT**

Plaintiff William Reynolds and Defendant Fairview Health Services ("Fairview"),
by and through their respective counsel, hereby stipulate and agree to the following:

1. WHEREAS, Plaintiff filed this action on February 27, 2025;
2. WHEREAS, Plaintiff filed an Amended Complaint on March 31, 2025;
3. WHEREAS, the Court may extend the time to answer or otherwise respond
to a complaint for good cause, *see* Fed. R. Civ. P. 6(b).

4. WHEREAS, whereas counsel for Plaintiff and counsel for Fairview met and conferred regarding the waiver of service and the time to respond to the Amended Complaint.

5. WHEREAS, Fairview executed a waiver of service on May 12, 2025 providing for a response deadline of July 11, 2025. (*See* ECF No. 12.)

6. WHEREAS, counsel for Plaintiff and counsel for Fairview agree that the deadline for Fairview agree that the deadline for Fairview to answer or otherwise respond to Plaintiff's Amended Complaint may be extended until August 1, 2025.

7. WHEREAS, good cause exists to extend the deadline because Fairview needs additional time to meaningfully answer or otherwise respond to Plaintiff's Amended Complaint, which is 113 pages long and asserts nine causes of action on behalf of five plaintiffs against multiple defendants, including theories of vicarious liability and conspiracy;

8. WHEREAS, the undersigned counsel have significant caseloads, including expert report deadlines, multiple depositions, a summary judgment motion hearing, and a multi-day out-of-state travel commitment on client business before the currently schedule July 11, 2025 deadline, as well as a criminal trial scheduled to begin on July 14 which will require preparation in advance of July 11.

9. WHEREAS, two federal holidays, Juneteenth and Independence Day, occur prior to the current July 11 deadline;

10. WHEREAS, an additional 21 days for Fairview to respond to the Amended Complaint will not have a significant impact on the scheduling of this case because no

scheduling order has been issued yet, all or nearly all of the other defendants also have response deadlines of August 1, and Fairview seeks approval of this extension well in advance of the current deadline.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the parties to this Stipulation that the Court may enter an Order that states that Fairview shall answer or otherwise respond to Plaintiff's Amended Complaint on or before August 1, 2025.

DATED: June 17, 2025

Respectfully Submitted,

Law Offices of J.M. Reinan, PC

By: /s/ Jerome M. Reinan
JEROME M. REINAN (#24322X)
1437 High Street
Denver, CO 80218
Telephone: (303) 894-0383
jreinan@reinanlaw.com
jgingrass@reinanlaw.com

Attorney for Plaintiff William Reynolds

MADEL PA

By: /s/ Todd L. Hennen
Christopher W. Madel (#230297)
Todd L. Hennen (#398710)
800 Pence Building
800 Hennepin Avenue
Minneapolis, MN 55403
Telephone: 612-605-0630
cmadel@madellaw.com
thennen@madellaw.com

Attorneys for Defendant Fairview Health Services